

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

April 6, 2004

TO: Internal File

THRU: Wayne Western, Team Lead

FROM: Priscilla Burton, Environmental Scientist,III

RE: Revision of Chapters 2 & 3, Canyon Fuels Co., Soldier Canyon Mine,
C/007/0018, Tasks #1784

SUMMARY:

Information was received on September 5 and December 15, 2003 with supplemental information being received on January 30, 2003 and March 19, 2003. The submittal has been received under Task numbers 1665, 1668 and now 1784. A soil scientist was not originally assigned to this review. However during a conference call January 7, 2003, with the Permittee, the importance of the soils handling aspects of the amendment to the review were recognized. Consequently, I am joining the review team to summarize the effects of the amendments given task number 1784 (and Task 1829 in a separate memo) on the soils handling and redistribution at the Soldier Canyon Mine.

Several test plots have been established at the mine site (Sec 2.23 p 2-17, 2-18 and Sec. 2.33 p 2-30). Information from these test plots has been gathered and reported in the Annual Reports dated 1985 through 1992.

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TECHNICAL ANALYSIS:

GENERAL CONTENTS

PERMIT APPLICATION FORMAT AND CONTENTS

Regulatory Reference: 30 CFR 777.11; R645-301-120.

Analysis:

Previously discrepancies outlined in this section have been resolved.

Findings:

The information provided meets the requirements of Permit Application Format and Contents.

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

SOILS RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.21; 30 CFR 817.22; 30 CFR 817.200(c); 30 CFR 823; R645-301-220; R645-301-411.

Analysis:

Table 2-24-3, "Soil and Laboratory Analysis Results" gives information for Test Pit 1. The Table is referenced in the text Section 2.24 page 2-24. Test Pit 1 provides information on the soils of the Waste Rock site which was not constructed.

Soil survey information for the facilities expansion, received by the Division on November 20, 1991, was included as Appendix 2-G of the application. This information includes a letter from Leland Sasser, Soil Scientist with the Soil Conservation Service, dated October 25, 1991 along with a map and field description of the soils affected by the facilities expansion.

Exhibit 5.21-2, referred on pages 2-31, 2-32 and 2-39 of the MRP shows the original topsoil storage site configuration in 1992. Since then, the topsoil storage site has expanded to 8.6 acres with 7.8 acres being disturbed. Of those 7.8 acres, 2.3 acres are used as storage of topsoil, subsoil and landscape boulders/rock for the Soldier Creek Mine (p 5-33 Chapter 5 of the revision and Plate 2-3 of Appendix 2-F).

A table in the text on page 2-29 has been updated with information concerning topsoil stockpiled from the facilities expansion (ten years ago). This table reports 16,704 CY of stockpiled topsoil and substitute topsoil based upon information found in Figures 2 and 3, Appendix 2E . (see also Chapter 5 and Division's review of Task 1829).

The seed mix used on the topsoil stockpile is described in Section 2.31.4 page 2-27. Vegetation growth on the stockpile is summarized in annual reports from 1994 – 1996.

Tables including Table 2.22-1 "Soil Laboratory Analysis Results - Mine Area Proper" have been included at the end of Chapter 2.

Several test plots have been established at the mine site (Sec 2.23 p 2-17, 2-18 and Sec. 2.33 p 2-30). Information from these test plots has been gathered and reported in the Annual Reports dated 1985 through 1992. Additional vegetation information is found in the Annual Reports dated 1994 through 1996.

Findings:

The information provided meets the requirements of Soil Resource Information.

RECLAMATION PLAN

BACKFILLING AND GRADING

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Analysis:

General

Section 2.43 page 2-34 describes the sampling of the regraded surface prior to seeding. Samples will be taken at a rate of one sample per five acres for each type of disturbed site. sample field and laboratory parameters to be analyzed are described.

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The reference to Exhibit 7.60-1 in Section 2.42 has been changed to Map 760A.

Findings:

The information provided meets the requirements of Backfilling and Grading.

RECOMMENDATIONS:

Approval is recommended.